

**IN THE UNITED STATES DISTRICT FOR THE
EASTERN DISTRICT OF TEXAS,
SHERMAN DIVISION**

JASON LEE VAN DYKE,	§	
<i>Plaintiff,</i>	§	
v.	§	
	§	
THOMAS CHRISTOPHER	§	NO. 4:18-CV-247-ALM
RETZLAFF, a/k/a DEAN	§	
ANDERSON, d/b/a BV FILES, VIA	§	
VIEW FILES, L.L.C., and VIAVIEW	§	
FILES,	§	
<i>Defendants</i>	§	

**DEFENDANT THOMAS RETZLAFF'S SUPPLEMENTAL RULE 26(a)(1)
DISCLOSURES**

TO: Jason Lee Van Dyke, Plaintiff Pro Se.

Pursuant to FED. R. CIV. P. 26(a)(1), defendant Thomas Retzlaff serves his

First Amended Initial Disclosures.

- A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of information:

1. Tom Retzlaff

c/o Hanszen Laporte, LLP 14201 Memorial Drive
Houston, Texas 77079
713-522-9444

Defendant and has knowledge of all facts pertaining to his defenses in this suit. Defendant filed a grievance against Van Dyke and has been threatened with violence by Van Dyke as a result.

2. Brittany Retzlaff

(address & phone number withheld due to murder threats by Van Dyke and his white supremacist *Proud Boys* gang)

Witness has knowledge of facts pertaining the series of SLAPP lawsuits filed by James McGibney, Philip Klein, and plaintiff against Tom Retzlaff (her father) and the violent threats made against him and

her family, along with all the false criminal allegations made by all of these people against her father to various law enforcement agencies, and she knows that plaintiff is a mentally unstable, violent Nazi and white supremacist.

3. **Toby Ross**
Director, Denton County CSCD
650 South Mayhill Road
Denton, TX 76208-6313
(940) 349-3300

Witness has knowledge of Van Dyke's criminal and personal history, including any pedophilic tendencies, and knows that Van Dyke is a mentally unstable, violent Nazi and white supremacist.

4. **Paul Johnson, Kristin Kidd, Robert Frey, Lara Tomlin**
Denton County District Attorney's Office
1450 E. McKinney Street, Suite 3100
Denton, TX 76204-4524
(940) 349-2600

The witnesses are prosecutors who have knowledge of Van Dyke's criminal history, allegations that Van Dyke has the look of a pedophile and is a mentally unstable, violent Nazi and white supremacist. They have knowledge of Van Dyke's plot to murder Retzlaff, his attorney Jeffrey L. Dorrell, Denton City Councilwoman Deb Armintor, Dallas dentist Dr. Ryan Daniel, State Bar prosecutor Kristin Brady, and others. They have custody of an audio recording made by an FBI informant of Van Dyke discussing the murder plot with fellow *Proud Boys* gang members.

5. **Steve Tyler**
1501 E. Mockingbird Ln., Ste 311
Victoria, TX 77904-2153
(361) 935-1605

The witness is the former Victoria County District Attorney who was sued by Van Dyke and has knowledge of facts surrounding the decision to hire Van Dyke and to rescind the job offer.

6. **Randall L. Kallinen**
Kallinen Law PLLC
511 Broadway St
Houston, Texas 77012
(713) 320-3785

The witness is an attorney who has knowledge of Van Dyke and his violent, abusive litigation tactics. The witness has defended prior SLAPP lawsuits that have been filed by plaintiff against his critics and

knows that plaintiff is a mentally unstable, violent Nazi and white supremacist.

7. **Gerald Bello II**
Mockingbird Publishing
675 Riverview Dr., Apt. B4
Columbus, OH 43202
Unknown phone number

The witness is a newspaper publisher who has knowledge of Van Dyke's violent, abusive litigation tactics. The witness has defended other SLAPP suits filed by Van Dyke against his critics and knows Van Dyke to be a mentally unstable, violent Nazi and white supremacist. Witness has also filed a grievance against Van Dyke and has been threatened with violence by Van Dyke as a result.

8. **Will Sommers**
The Daily Beast
555 W. 18th St
New York, NY 11215
(212) 445-4000

Witness is a reporter for *The Daily Beast* and the author of various news articles on Van Dyke whom Van Dyke copied on his e-mailed death threats to Retzlaff.

9. **The Hon. Dennise Garcia**
303rd District Court
600 Commerce St.
4th Floor New Tower
Dallas, TX 75202
(214) 653-7611

Witness is judge appointed to preside over Van Dyke's disbarment trial and can testify she has not been contacted by Retzlaff.

10. **Mike Shackleford & Brian Howard**
Oak Point Dept of Public Safety
100 Naylor Rd
Oak Point, TX 75068
(972) 294-0000

Chief of Police Mike Shackleford was sued by Van Dyke and has knowledge of Van Dyke's malicious prosecution suit filed after Van Dyke was arrested for tampering with witnesses. The witnesses have knowledge of various state and federal investigations into Van Dyke and his violent white supremacist gang, as well as the various criminal prosecutions against Van Dyke. The witnesses have knowledge about Van Dyke's weapons and threats of violence and intimidation against his critics. They know Van Dyke to be a mentally unstable, violent

Nazi and white supremacist. The witnesses have knowledge of Van Dyke's plot involving several of *Proud Boys* gang members to murder Retzlaff, his attorney Jeffrey L. Dorrell, Denton City Councilwoman Deb Armintor, Dr. Ryan Daniel, DDS, of Dallas (who filed a grievance against Van Dyke for which Van Dyke's law license was temporarily suspended), and State Bar prosecutor Kristin Brady. The witnesses can further testify as to the information that was obtained from Van Dyke's computer and other electronic devices, as well as information obtained as a result of the search warrant of Van Dyke's residence and e-mail or social media accounts. They have custody of an audio recording made by an FBI informant of Van Dyke discussing the murder plot with fellow Proud Boys gang members.

11. Kristin Brady

State Bar of Texas
14651 Dallas Parkway, Suite 925
Dallas, Texas 75254
(972) 383-2900

Witness has knowledge of facts pertaining to suit to disbar or discipline Van Dyke and was copied by Van Dyke on Van Dyke's e-mailed murder threats to Retzlaff.

12. Gavin McInnes

88 Park Ave.
Larchmont, NY 10538-4224

Witness is founder and former leader of the "Proud Boys" white supremacist gang and has knowledge Van Dyke's involvement therein, and knows Van Dyke to be a violent, mentally unstable Nazi and white supremacist. The witness can further testify that he has been an informant cooperating fully with the FBI and DHS into their investigation of his former attorney Jason Van Dyke and the *Proud Boys* gang.

13. Deb Armintor

Denton City Council, Place 5
215 E. McKinney St.
Denton, TX 76201
(940) 300-9857

Witness is a city council member who has been threatened by plaintiff and who is a witness to his criminal behavior and knows that plaintiff is a mentally unstable, violent Nazi and white supremacist. Witness has previously filed a grievance against Van Dyke and has been threatened with violence by Van Dyke as a result.

14. John Council

Texas Lawyer Magazine

1999 Bryan St
Dallas, TX 75201
(214) 744-9300

Witness is a reporter for *Texas Lawyer* magazine and the author of various news articles on Van Dyke whom Van Dyke copied on his e-mailed death threats to Retzlaff.

- 15. Andy Campbell**
Senior Reporter
Huffington Post / Verizon Media
770 Broadway
New York, NY
(202) 334-6000

Witness is a reporter for the *Huffington Post* and the author of various news articles on Van Dyke whom Van Dyke copied on his e-mailed death threats to Retzlaff. Has knowledge that Van Dyke is a Nazi and a white supremacist, as well as a violent, unhinged lunatic who has repeated made violent threats against Campbell and other news reporters. Witness has filed a grievance against Van Dyke and has been threatened with violence by Van Dyke as a result.

- 16. Kenneth P. White**
Brown, White & Osborn, LLP
333 S. Hope St., 40th Floor
Los Angeles, CA 90071
(213) 613-9446

Witness is a former United States attorney now in private practice in Los Angeles. He can testify as to the threats he has personally received from Van Dyke, both in person and by email, and can testify that Van Dyke is a Nazi and a violent white supremacist. Witness runs an internationally known blog called *Popehat.com* in which Van Dyke is subject to frequent criticism. Witness filed a grievance against Van Dyke and was threatened with violence by Van Dyke and his *Proud Boys* gang as a result.

- 17. Lauren A. Harris**
9330 Lyndon B. Johnson Fwy., #900
Dallas, TX 75243
(469) 818-3079

Witness is an attorney in Dallas. She can testify as to the threats she has personally received from Van Dyke, both in-person and via email, as a result of her merely being a lawyer representing someone who Van Dyke sued, and she can further testify that Van Dyke really is a Nazi and a violent white supremacist. The witness represents Dr. Ryan Daniel, a man who was the previous victim of a Van Dyke

SLAPP lawsuit and who also has been personally threatened with violence by Van Dyke. Witness has previously filed a grievance against Van Dyke and has been threatened with violence by Van Dyke as a result.

18. Dr. Ryan Daniel, D.D.S.

2650 E.S.H 121
The Colony, TX 75056
(972) 315-6060

Witness filed a grievance against Van Dyke and was threatened with violence by Van Dyke as a result. Witness has been the victim of an earlier SLAPP lawsuit filed by Van Dyke and knows Van Dyke to be a Nazi and a violent white supremacist who makes threats of violence against those that oppose him or criticize his work as an attorney. The witness can testify that Van Dyke has made false police reports against him in an effort to gain an unfair advantage against the witness in a lawsuit Van Dyke has filed against him, for which Van Dyke was suspended by the state bars of Texas and Colorado.

19. Richard L. (“Luke”) Campbell

Wise County (TX) Sheriff’s Office
200 Rook Ramsey Dr.
Decatur, TX 76234
(940) 627-5971

Witness is detective with the sheriff’s department and can testify that Van Dyke has filed numerous police reports with that office claiming that Retzlaff has committed crimes against Van Dyke and is running an “illegal” blog and is supposedly engaging in “criminal stalking” of the plaintiff and his family. The witness has knowledge that Van Dyke is a Nazi and is a white supremacist.

20. Special Agent Kevin Palomino

North Texas Joint Terrorism Task Force
Federal Bureau of Investigation
One Justice Way
Dallas, TX 75220
(972) 559-5000

The witness is a special agent employed by the Dept. of Homeland Security who is detailed to the FBI Joint Terrorism Task Force in Dallas. Witness has knowledge of various state and federal investigations into Van Dyke and his violent white supremacist gang *The Proud Boys*, as well as various criminal prosecutions against Van Dyke. Witness has knowledge of Van Dyke’s weapons and threats of violence and intimidation against his critics. The witness knows Van Dyke to be a mentally unstable, violent Nazi and white supremacist. The witness has knowledge of the plot involving Van Dyke and

several of his *Proud Boys* gang members to murder Retzlaff, his lawyer Jeffrey L. Dorrell, Denton City Councilwoman Deb Armintor, Dr. Ryan Daniel, DDS, of Dallas (who filed a grievance against Van Dyke for which Van Dyke's law license was temporarily suspended), and State Bar prosecutor Kristin Brady. The witness can further testify as to the information that was obtained from Van Dyke's computer and other electronic devices, as well as information obtained as a result of the search warrant of Van Dyke's residence and e-mail or social media accounts. The witness has custody of an audio recording made by an FBI informant of Van Dyke discussing the murder plot with fellow Proud Boys gang members.

21. Special Agent Walker Wicevich

Federal Bureau of Investigation
21711 N. 7th St.
Phoenix, AZ 85024
(623) 466-1999

Witness has knowledge of the various state & federal investigations into Van Dyke and his violent white supremacist gang *The Proud Boys*, as well as various criminal prosecutions against Van Dyke. Witness has knowledge about Van Dyke's weapons and threats of violence and intimidation against his critics. The witness knows Van Dyke to be a mentally unstable, violent Nazi and white supremacist. The witness has knowledge of the plot involving Van Dyke and several *Proud Boys* gang members to murder Retzlaff, his lawyer Jeffrey L. Dorrell, Denton City Councilwoman Deb Armintor, Dr. Ryan Daniel, DDS of Dallas (who filed a grievance against Van Dyke for which Van Dyke's law license was temporarily suspended), and State Bar prosecutor Kristin Brady. The witness can further testify as to the information that was obtained from Van Dyke's computer and other electronic devices, as well as information obtained as a result of the search warrant of Van Dyke's residence and email or social media accounts. Furthermore, the witness has personal knowledge of the many swatting attempts and false police reports made against Retzlaff by Van Dyke, James McGibney and others.

22. Captain Eddie Barrett

Denton County Sheriff's Office
127 N. Woodrow Lane
Denton, TX 76205-6325
(940) 349-1600

Witness has knowledge of the various state & federal investigations into plaintiff and his violent white supremacist gang *The Proud Boys*, as well as the various criminal prosecutions against plaintiff. Witness has knowledge about plaintiff's weapons and threats of violence and intimidation against his critics. The witness knows that plaintiff is a mentally unstable, violent Nazi and white supremacist. The witness

has knowledge of the murder plot involving Van Dyke and several of his *Proud Boys* gang members to murder Retzlaff, his lawyer Jeffrey L. Dorrell, Denton City Councilwoman Deb Armintor, Dr. Ryan Daniel, DDS of Dallas (who filed a grievance against Van Dyke as a result of which Van Dyke's law license was temporarily suspended), and State Bar prosecutor Kristin Brady. The witness can further testify as to the information that was obtained from Van Dyke's computer and other electronic devices, as well as information obtained as a result of the search warrant of Van Dyke's residence and email / social media accounts. The witness has custody of an audio recording made by an FBI informant of Van Dyke discussing the murder plot with fellow *Proud Boys* gang members.

- 23. Det. Aaron Benzick**
 Plano Police Department
 909 14th St.
 Plano, TX 75074
 (972) 941-2450

Witness has knowledge of the various state & federal investigations into plaintiff and his violent white supremacist gang *The Proud Boys*, as well as the various criminal prosecutions against plaintiff. Witness has knowledge about plaintiff's weapons and threats of violence and intimidation against his critics. The witness knows that plaintiff is a mentally unstable, violent Nazi and white supremacist. The witness has knowledge of the plot involving Van Dyke and several of his *Proud Boys* gang members to murder Retzlaff, his lawyer Jeffrey L. Dorrell, Denton City Councilwoman Deb Armintor, Dr. Ryan Daniel, DDS, of Dallas (who filed a grievance against Van Dyke for which Van Dyke's law license was temporarily suspended), and State Bar prosecutor Kristin Brady. The witness can testify as to the information that was obtained from Van Dyke's computer and other electronic devices, as well as information obtained as a result of the search warrant of Van Dyke's residence and e-mail or social media accounts.

- 24. James A. McGibney**
 5655 Silver Creek Valley Rd.
 San Jose, CA 95138
 (408) 601-0685

The witness is an associate of Van Dyke who provides him with information and encouragement with regards to the plot to murder Retzlaff, Jeffrey L. Dorrell, Deb Armintor and other by Van Dyke and members of his *Proud Boys* gang, as well as encouraging and supporting Van Dyke's SLAPP litigation. The witness and Van Dyke are responsible for making a series of false police reports against Retzlaff with state and federal law enforcement agencies in an effort to get Retzlaff "swatted" and falsely arrested so as to gain an unfair

advantage over him in their series of SLAPP lawsuits.

25. Jason Lee Van Dyke

117 Hillcrest Ln.
Decatur, TX 76234
(940) 305-9242

Plaintiff has knowledge of his threats of violence and murder against Retzlaff, Jeffrey L. Dorrell, Deb Armintor, Kristin Brady, and others. Van Dyke has knowledge of his white supremacist activities, his leadership of the *Proud Boys*, and of his own criminal conduct and violation of state bar rules and ethics. Van Dyke has knowledge of his own sexual proclivities.

26. Daniel Van Dyke

1554 Echo Ridge St. SW
Rochester, MN 55902
(507) 284-2511

The witness is the father of plaintiff and has knowledge of the criminal charges against plaintiff, including his witness tampering in plaintiff's criminal case in Denton County. The witness has knowledge of his son's claims of "criminal stalking" against Retzlaff allegedly involving the witness and other Van Dyke family members.

27. Isaac Marquardt

(address & phone number withheld due to safety concerns and threats by Van Dyke and his white supremacist gang)

The witness has knowledge of Van Dyke's Nazi and white supremacist beliefs and actions, as well as of Van Dyke's plot with other *Proud Boys* gang members to murder Retzlaff, Jeffrey L. Dorrell, Deb Armintor, Dr. Ryan Daniel, and others.

28. Robert Karlseng

Karlseng, LeBlanc, & Rich, LLC
5412 W Plano Pkwy
Plano, TX 75093-4843
972-733-3800

The witness has knowledge as to exactly why Van Dyke was fired from employment with this law firm, as well as Van Dyke's work habits and income.

29. Edward Lamonica, Ashley Mitchell, Allen Humphris

White, Jacobs & Associates (aka Tucker Albin & Assoc)
200 Chisholm Place, Ste 250
Plano, TX 75075
(800) 505-9810

These witnesses have knowledge of Van Dyke's employment with their companies and his personal work habits and the reasons for his termination from employment. They can also testify as to the physical security of the job site and who would (or would not) have had access to Van Dyke's workstation and computer. They have knowledge of Van Dyke's Internet Service Provider.

30. Hannah Poe

Pecan Branch Counseling
525 S Locust St #101
Denton, TX 76201
(940) 565-8300

The witness is a psychological counselor at Pecan Branch Counseling who has been treating Van Dyke for about a year and can testify about Van Dyke's mental instability and violent tendencies.

Respectfully submitted,

HANSZEN LAPORTE

By: /s/ Jeffrey L. Dorrell

JEFFREY L. DORRELL

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ATTORNEYS FOR DEFENDANT TOM RETZLAFF

CERTIFICATE OF SERVICE

I certify that on 3-14, 2020, the foregoing was electronically filed using the Court's CM/ECF filing system, which will provide notice and a copy of this document to the following if a registered ECF filer in the United States District Court for the Eastern District of Texas, Sherman Division.

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/s/ Jeffrey L. Dorrell
JEFFREY L. DORRELL